

INTERVENTION
ORIGINAL



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AZ CORP COMMISSION
DOCKET CONTROL

Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION

GARY PIERCE, Chairman
BOB STUMP
SANDRA KENNEDY
PAUL NEWMAN
BRENDA BURNS

Arizona Corporation Commission
DOCKETED

JUN 20 2011



IN THE MATTER OF THE APPLICATION)
OF ARIZONA PUBLIC SERVICE COMPANY)
FOR A HEARING TO DETERMINE THE FAIR)
VALUE OF THE UTILITY PROPERTY OF THE)
COMPANY FOR RATEMAKING PURPOSES,)
TO FIX A JUST AND REASONABLE RATE)
OF RETURN THEREON, TO APPROVE RATE)
SCHEDULES DESIGNED TO DEVELOP SUCH)
RETURN.)

DOCKET NO. E-0134A-11-0224⁵

MOTION TO INTERVENE
OF WESTERN RESOURCE
ADVOCATES

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission
("Commission"), Western Resource Advocates ("WRA") hereby moves to intervene in the
above-captioned docket and, in support thereof, states as follows:

1. WRA is a regional environmental law and policy center serving the Rocky
Mountain and Desert Southwest states. WRA has been involved in proceedings before the
Commission since about 1990 and has been granted intervenor status in numerous dockets.

1 WRA has staff members and multiple supporters who live and recreate in Arizona and/or are
2 APS electric ratepayers.

3 2. WRA's Energy Program promotes policies and programs designed to encourage
4 the development of clean energy power production technologies, energy efficiency, renewable
5 resources, distributed generation, and other measures that help reduce the environmental impacts
6 of meeting the demand for energy services and encourage sustainable rural economic
7 development, while minimizing the costs and risks to ratepayers of fuel price volatility and
8 environmental regulatory requirements. It has appeared in rate proceedings before the
9 Commission and in other state and federal regulatory forums to recommend, among other things,
10 improvements in rate design for sending efficient price signals and cost recovery mechanisms for
11 investments in renewable energy and energy efficiency.

12 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding.

13 4. WRA requests that all pleadings, correspondence, discovery and other documents
14 be served on the following:
15

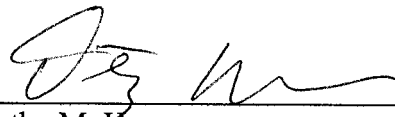
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WHEREFORE, WRA respectfully requests that the Commission issue an order granting
its Motion to Intervene in the above-captioned proceeding.

1 DATED this 20th day of June, 2011.

2 ARIZONA CENTER FOR LAW IN
3 THE PUBLIC INTEREST

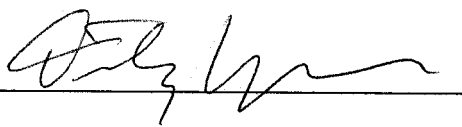
4 By 
5 Timothy M. Hogan
6 202 E. McDowell Rd., Suite 153
7 Phoenix, Arizona 85004
8 Attorneys for Western Resource
9 Advocates

10 ORIGINAL and 13 COPIES of
11 the foregoing filed this 20th day
12 of June, 2011, with:

13 Docketing Supervisor
14 Docket Control
15 Arizona Corporation Commission
16 1200 W. Washington
17 Phoenix, AZ 85007

18 COPIES of the foregoing
19 Electronically mailed this
20 20th day of June, 2011 to:

21 All Parties of Record

22 
23
24
25